



**STATE OF WASHINGTON**  
**DEPARTMENT OF SOCIAL AND HEALTH SERVICES**  
**HEALTH AND RECOVERY SERVICES ADMINISTRATION**  
**PO Box 45536 • Olympia WA 98504-5536**

7/03/06

**TO:** Regional Administrators  
CSO Administrators  
HCS Administrators  
Regional Financial Coordinators  
Financial Supervisors  
Financial Staff

**FROM:** Steven Wish, Director  
Division of Customer Support  
Health and Recovery Services Administration

Bill Moss, Director  
Home and Community Services  
Aging and Disability Services Administration

**SUBJECT: CITIZENSHIP AND IDENTITY REQUIREMENTS OF THE DEFICIT REDUCTION ACT (DRA) OF 2005**

**Background:** The federal DRA of 2005 requires states to document the citizenship and identity of all applicants and recipients of Medicaid. Washington State will establish regulations and procedures incrementally to achieve full compliance with the federal expectation. Washington has always required that individuals be citizens or designated immigrants to be found eligible for Medicaid. Citizens have been allowed to “self declare” their citizenship on an application that is signed under a “penalty of perjury” statement. The department has not required that citizenship status be verified, unless the client statement was questionable. The department has not required verification of the identity of recipients of Medicaid.

**CSO/CSC/HCS/MEDS Implementation:**

**Medicaid applications** received beginning July 1, 2006, the worker will:

- For in-office interviews:
  - Ask for citizenship and identity verification from the client for each person applying for Medicaid:

- For any client stating birth in WA, worker will verify through DOH vital statistics look-up.
- If born out of state or verification cannot be found in DOH look-up, but client has access to verification, give pend letter and allow client 10 days to provide.
- If does not have verification, have them complete the *Citizenship Documentation and Identity Affidavit* during the interview.
- For mail-in applications:
  - Send a pend letter requesting citizenship and identity verification for each person applying for Medicaid and attach the *Citizenship Documentation and Identity Affidavit*. If the client does not have the verification they must return the completed affidavit.
- For both in-office and mail-in applications, any applicant who does not provide either the verification or the signed affidavit will be denied. No denials will be made if the client is making a “good faith effort” to submit the affidavit or obtain required documentation. Workers must contact their HRSA Regional Representative (see below) before denying any applicant for lack of citizenship documentation.

Exceptions:

- TANF cash recipients and foster care children in relative placement will be requested to verify citizenship and identity but will not be denied benefits if the information is not provided.
- SSI recipients will not be pended or denied for this information.

**For Medicaid eligibility reviews**, the worker must review DMS or the hard file for any previously obtained documents that support the claim of citizenship and identity and update ACES if documentation is available. Staff will not pend for verification of citizenship or identity at this time. Staff will receive further instructions before being asked to pend or deny clients at eligibility review for the new citizenship and identity requirements. Please follow current procedures for processing eligibility reviews at this time.

To track the documentation, new citizenship verification valid values have been developed for the ACES DEM2 screen.

T1 – Meets Federal Requirements – (Tier One)  
T2 – Meets Federal Requirements – (Tier Two)  
T3 – Meets Federal Requirements – (Tier Three)  
T4 – Meets Federal Requirements – (Tier Four)  
AF –Affidavit, Federal Verification Pending

The worker will use the T1 – T4 codes only when documentation in the client’s case record meets the federal requirements described on the attached chart. As new or additional documentation of citizenship is obtained, the worker will update the VV code to correspond with the highest level of verification provided.

The AF code is used when the worker has received a completed *Citizenship Documentation and Identity Affidavit*.

ITD is working with HRSA to develop a new ACES VV code to show we have obtained documentation of an individual's identity. You will be notified as soon as possible when that additional tracking methodology is completed.

**NOTE:** Included with this memo is the *Citizenship Documentation and Identity Affidavit*, sample language that can be used as a template for pend letters, and a table with the new ACES valid values for citizenship.

**Centralized Unit:** HRSA will be establishing a centralized unit to help obtain citizenship documentation that is not readily available. Further information on this centralized unit will be sent within the next few weeks.

**EXAMPLES:**

A mother applies for Family Medical (F04) for herself and her two children; age 10 and 12. The family is otherwise eligible and the worker screens for available documentation in DMS and finds the mother had previously provided her own certified birth certificate and hospital birth certificates for the two children. The DEM2 screen of the mother is coded C (citizen) with a VV of T2. The children are coded as C but none of the documents sufficient for T1 – T4 VV codes exist in case file/DMS. The mother completes the *Citizenship Documentation and Identity Affidavit*. Use the VV of AF for each child.

An elderly man is hospitalized and the physician recommends the man go to a NF. The man's daughter has completed the application and has also provided her father's Washington State photo ID card. He was born in the state of Georgia and does not have his birth certificate. His DEM2 screen is coded as C but none of the documents sufficient for T1 – T4 VV codes exist in case file/DMS. Send a pend letter to the daughter for completion of the *Citizenship Documentation and Identity Affidavit*. Use the VV of AF.

A woman, age 67, is due for her eligibility review for S02 Medicaid. Her son who has read of the DRA requirements has done some research on the issue. His mother was born at home and the birth was not registered. However, he **voluntarily** sends in an alternative form of documentation of her citizenship with her eligibility review. His mother has maintained a small life insurance policy for 40 years. Insurance company records indicate she was born in Alabama. The DEM2 screen of the mother is coded C (citizen) with a VV of T3. In addition, he sends in her expired WA photo ID card. Ensure both documents are retained in case file/DMS.

A 20 year old woman applies for pregnancy coverage. An advocate assisting her with her application has advised her of the new regulation. All application forms are complete; income verification and a US Passport are attached. Her DEM2 coding is updated to reflect T1 which has adequately both identified her and documented citizenship.

**REMINDER:** You will be notified in the next few weeks of additional incremental changes as the department moves towards full implementation of DRA 2005 requirements. If you have any questions about this issue, contact your HRSA representative.

Region	Representative	Phone Number	E-mail Address
Region 1	Mary Beth Ingram	360-725-1327	<a href="mailto:ingramb@dshs.wa.gov">ingramb@dshs.wa.gov</a>
Region 2	Joanie Scotson	360-725-1330	<a href="mailto:scotsjk@dshs.wa.gov">scotsjk@dshs.wa.gov</a>
Region 3	Kathy Johansen	360-725-1321	<a href="mailto:johankj@dshs.wa.gov">johankj@dshs.wa.gov</a>
Region 4	Joanie Scotson	360-725-1330	<a href="mailto:scotsjk@dshs.wa.gov">scotsjk@dshs.wa.gov</a>
Region 5	Lori Rolley	360-725-1304	<a href="mailto:rollelj@dshs.wa.gov">rollelj@dshs.wa.gov</a>
Region 6	Cathy Fisher	360-725-1357	<a href="mailto:fishectl@dshs.wa.gov">fishectl@dshs.wa.gov</a>

cc: Doug Porter, Health and Recovery Services Administration  
Deb Bingaman, Economic Services Administration  
Kathy Leitch, Aging and Adult Services Administration  
Mike Hart, Community Services Division

Bcc: Eligibility Policy and Community Education Section  
Manning Pellanda, MEDS

## New Citizenship Valid Values

<b>T1 – Examples</b> (Only Tier 1 documents are considered by the federal government to document both citizenship and identity).
<ul style="list-style-type: none"><li>• US Passport;</li><li>• A Certificate of Naturalization; or</li><li>• A Certificate of Citizenship.</li><li>• American Indian/Alaska Native Photo ID Card with enrollment number</li></ul>
<b>T2 – Examples</b>
<ul style="list-style-type: none"><li>• An official state/county US birth certificate;***</li><li>• Other certification of birth issued by the Department of State;</li><li>• US Citizen ID card;</li><li>• Final adoption decree in the US;</li><li>• Evidence of civil service employment by the US government before June 1976; or</li><li>• Official military record of service that shows a US place of birth.</li></ul> <p>***<b>NOTE: A “hospital” birth certificate is considered by the federal government to be a souvenir and <u>does not</u> meet the federal requirement for any “T” level of verification.</b></p>
<b>T3 – Examples</b> (The T3 tier of verification must be created 5 years before the date of initial application or eligibility review).
<ul style="list-style-type: none"><li>• Insurance company records (life or health), that indicates a US place of birth; or</li><li>• US hospital record <b>created at the time of birth</b>, indicating a US place of birth such as:<ul style="list-style-type: none"><li>▪ Chart notes of the birth; or</li><li>▪ Of the baby’s stay in the hospital.</li></ul></li></ul>
<b>T4 – Examples</b>
<ul style="list-style-type: none"><li>• Federal or State census record indicating US citizenship or US place of birth</li><li>• Institutional admission papers indicating a US place of birth and created 5 years before the date of initial application or review.</li><li>• Other medical records (clinic, doctor, or hospital), created five years before the date of initial application or review that indicate a US place of birth.</li><li>• Written affidavit ***<b>Do NOT use until department form is available. The <i>Citizenship Documentation and Identity Affidavit</i> form does not fulfill this requirement.</b></li></ul>
<b>Identity – Examples</b>
<ul style="list-style-type: none"><li>• A current state driver’s license with individual’s picture</li><li>• A state identity card with individual’s picture</li><li>• A US American Indian/Alaska Native tribal document</li><li>• Military identification card with individual’s picture</li><li>• ** <b><i>For a child under the age of 16 only</i></b>, the client may use the <i>Citizenship Documentation and Identity Affidavit</i> form attesting to the child’s identity.</li></ul>